IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DECKERS OUTDOOR CORPORATION,	)	
	)	
Plaintiff,	)	Case No. 15-cv-1191
	)	
v.	)	**Judge Manish S. Shah**
	)	
XIAO MEI, et al.,	)	**Magistrate Judge Young B. Kim**
	)	
Defendants.	)	
	)	
	)	

MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S *EX PARTE* MOTION TO EXTEND THE TEMPORARY RESTRAINING ORDER

Pursuant to Rule 65(b)(2) of the Federal Rules of Civil Procedure and the Court's inherent power to effectuate its own orders, Plaintiff Deckers Outdoor Corporation ("Deckers") seeks to extend the Temporary Restraining Order granted and entered by the Court on February 12, 2015 (the "TRO," *see* Docket Entries 17 and 18) by a period of fourteen (14) days until March 12, 2015.

On February 12, 2015, this Court entered the TRO against the Defendants identified on Schedule A to the Amended Complaint. Docket Entries 17 and 18. Since receiving the TRO, Deckers has been working diligently to ensure compliance with its terms by third parties. *See* Declaration of Justin R. Gaudio (the "Gaudio Declaration") at ¶ 2. In particular, Deckers sent a copy of the TRO to PayPal, Inc. ("PayPal") via e-mail on February 12, 2015. *Id.* As of February 13, 2015, PayPal has not yet effectuated the TRO, but is working diligently to comply. *Id.* Deckers plans to freeze identified PayPal accounts. *Id.* at ¶ 3.

Rule 65(b)(2) states that a temporary restraining order entered without notice may be extended provided a party can show, prior to expiration of the order, good cause for such an extension. Fed. R. Civ. P. 65(b)(2). Deckers respectfully submits that there is good cause to extend the TRO, since there is a high probability that the Defendants will continue to harm Deckers without the TRO in place. Specifically, Defendants will likely attempt to move any assets from their PayPal accounts to off-shore bank accounts. As discussed in Deckers' Memorandum in Support of its Motion for Entry of a Temporary Restraining Order, and as found by the Court in granting the TRO, this possibility of harm is significant. Accordingly, in the interest of justice, Deckers submits that extension of the TRO is necessary. In light of the above, Plaintiff respectfully requests that the TRO be extended for a period of fourteen (14) days until March 12, 2015.

Dated this 13th day of February 2015.

Respectfully submitted,

_/s/ Justin R. Gaudio_______________

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